

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**TRAFFICSTARS, LTD'S MOTION FOR  
EXTENSION OF TIME TO ANSWER  
PLAINTIFFS' FIFTH AMENDED  
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Trafficstars, Ltd. files this Consent Motion for Extension of Time to Respond to Plaintiffs' Fifth Amended Complaint (Dkt. No. 193), and in support thereof states as follows:

1. On June 6, 2022, Plaintiffs filed the Fifth Complaint in this action (Dkt. No. 193).
2. On December 23, 2022, Defendant filed a timely Motion to Dismiss the Fifth Amended Complaint in this action (Dkt. No. 246).
3. On August 16, 2023, the Court held a hearing and orally denied Defendant's Motions to Dismiss.
4. On August 16, 2023, the Court entered a Minute Entry (Dkt. No. 305) denying Defendant's Motion to Dismiss.
5. Pursuant to Rule 12(a)(4), FRCP, Defendant has fourteen (14) days after the

Court's denial of its Motion to Dismiss to file its responsive pleading. Therefore, Defendant's responsive pleadings was to be due on or before August 30, 2023.

6. Counsel for Defendant is working on its responsive pleadings, but due to conflicting schedules with counsel and the client, counsel is unable to finalize the responsive pleadings by the deadline.

7. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge periods of time for good cause where, as here, the requested extension is made before the deadline. Defendant respectfully requests an additional twenty-one (21) days for it to file its responsive pleading. Therefore, with the extension, Defendant's responsive pleading to Plaintiff's Fifth Amended Complaint would be due on or before September 20, 2023.

8. The requested extension is not sought for dilatory reasons or for any other improper purpose, will not affect any other deadlines, will not prejudice any party or the Court, and no prior extension has been requested from the Court by Defendant.

9. Plaintiffs consent to Defendant's request.

WHEREFORE, Defendant Trafficstars, Ltd. respectfully requests this Court enter an order enlarging the time within which to respond to the Fifth Amended Complaint an additional twenty-one (21) days which makes Defendant's responses due on or before September 20, 2023.

Respectfully Submitted,

/s/ Hannah Rogers Metcalfe  
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*Attorneys for Defendant Hammy Media LTD,  
Trafficstars, LTD, and Wisebits IP, LTD*

August 30, 2023  
Greenville, South Carolina